

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI**

LUCAS HINKEBEIN,)	
)	
Plaintiff(s),)	
v.)	No. 4:16-CV-01655-SNLJ
)	
GAVIN HOPLER, et al.,)	
)	
Defendant(s).)	

JOINT STATUS REPORT AND REQUEST FOR EXTENSION OF STAY

Plaintiff and Defendants, by and through the undersigned, hereby submit this Joint Status Report and Request for Extension of Stay, and state as follows:

1. On November 14, 2018, the parties filed a Joint Motion to Stay Case Management Order and Vacate Trial Setting. The Joint Motion stated that the parties had reached a settlement in principle and that Plaintiff needed to negotiate with a lienholder and assess the desirability of establishing a trust to manage settlement proceeds. The Joint Motion sought 90 days to either dismiss this case or provide a status report to the Court.
2. The Court granted the Joint Motion on November 14, 2018.
3. Plaintiff represents that, since the stay was entered, he has pursued the goals of establishing a trust and finalizing settlement, including:
 - a. Negotiated with the lienholder;
 - b. Met with trust counsel and evaluated his options for managing settlement proceeds;
 - c. Was examined by his physician and had the physician create a report concerning his competency;

- d. Plaintiff's guardian and conservator, Mark Hinkebein, filed a motion to terminate the guardianship and conservatorship over Plaintiff;
 - e. A Guardian Ad Litem met with Plaintiff;
 - f. The Circuit Court of Jefferson County, Missouri, heard the motion to terminate the guardianship and conservatorship on January 25, 2019, and the motion was granted (case number 16JE-PR00044);
 - g. Engaged trust counsel to prepare the trust documents; and
 - h. Negotiated terms of the settlement agreement with Defendants.
4. Plaintiff expects that creation of the trust will take a few more weeks and that settlement can be finalized within a month.
5. The parties request that the Court extend its stay of this action for an additional 60 days from February 12, 2019, to allow the parties to finalize the settlement.
6. In the event that the Court grants this Joint Motion and the parties have not filed a stipulation of dismissal within 60 days of February 12, 2019, the parties will file a status update with the Court.

WHEREFORE, Plaintiff and Defendants respectfully request that this Court enter its Order extending the stay entered on November 14, 2018, and for any further relief as the Court deems just and proper.

Respectfully submitted,

BLITZ, BARDGETT & DEUTSCH, L.C.

By: /s/ Jason K. Turk
Robert D. Blitz, #24387MO
Kelley F. Farrell, #43027MO
Jason K. Turk, #58606MO
Amy E. Oslica, #66879MO
120 S. Central Avenue, Ste. 1500
St. Louis, MO 63105
Telephone: 314.863.1500
Facsimile: 314-863-1877
rblitz@bbdlc.com
kfarrell@bbdlc.com
jturk@bbdlc.com
aoslica@bbdlc.com

Attorneys for Plaintiff Lucas Hinkebein

KING, KREHBIEL & HELLMICH, LLC

By: /s/ William A. Hellmich
William A. Hellmich, #31182MO
2000 South Hanley Rd.
St. Louis, Missouri 63144
(314) 646-1110
(314) 646-1122 (facsimile)
bhellmich@kkkb.com

*Attorneys for Defendants Oliver "Glenn"
Boyer and Jefferson County*

BEHR, MCCARTER & POTTER P.C.

By: /s/ Timothy J. Reichardt
Timothy J. Reichardt, #57684MO
John P. Torbitzky, #65233MO
7777 Bonhomme, Ste. 1400
St. Louis, MO 63105
(314) 862-3800
(314) 862-3953 (facsimile)
treichardt@bmplaw.com
jtorbitzky@bmplaw.com

*Attorneys for Defendants Gavin Hopler,
Allen Rice, and Dennis Roberts*

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was sent via the Court's electronic notification system on this 8th of February, 2019.

/s/ Jason K. Turk